



Telecommunications Company
of the Americas, Inc.
901 Rosenberg
Galveston, Texas 77550
(409) 762-3555
FAX (409) 762-8188

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January 3, 1995

Secretary
Federal Communications Commission
Washington, D.C. 20554

RE: CC Docket No. 94-129; In the Matter of Policies and Rules
Concerning Unauthorized Changes of Consumers' Long Distance
Carriers; Before the Federal Communications Commission

Attached hereto are comments in response to CC Docket No. 94-129.

Pursuant to Section VI. ORDERING CLAUSES, NOTICE OF PROPOSED RULE
MAKING, Adopted: November 10, 1994, an original plus nine copies
are being filed so that each Commissioner may receive a personal
copy.

In addition, two copies are being filed with the Formal
Complaints Branch, Enforcement Division, Common Carrier Bureau.
One copy has also been filed with the Commission's copy
contractor, International Transcription Services.

Thank you for the Commission's consideration of the attached
comments.

Sincerely,

Wm. Terry Miller
President

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TELCAM Page 1 of 2

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64.1150 Letter of Agency Form and Content

(c) The letter of agency shall not be combined with
inducements of any kind on the same document.

COMMENTS

Telecommunications Company of The Americas, Inc. (TELCAM)
901 Rosenberg Street
Galveston, Texas 77550
(409) 762-3555

TELCAM respectfully suggests that the proposal to require
separate LOA/inducement forms be reconsidered; and instead, The
Commission regulate the detailed appearance and content of the
form, using the TELCAM or similar LOA as a guide.

TELCAM's form differs significantly from the FCC description of
"negative option LOA" form's characteristics. We refer
specifically to FCC wording in the CC Docket No. 94-129, NOTICE
OF PROPOSED RULE MAKING: "The characteristic common to all of
these marketing practices is that the inducement is combined
with the LOA and the inducement language is prominently
displayed on the inducement/LOA form while the PIC change
language is not, thus leading to consumer confusion."

As evidenced by the copy of TELCAM's box program LOA form below,
our form does not contain characteristics described as "common to
all of these market practices".

ENTRY BLANK AND LD APPLICATION BENEFITTING COMMUNITY-BASED CHARITIES

TELCAM: Telecommunications Company of the Americas, Inc. • P.O. Box 1265 • Galveston, Texas 77553-1265

MUST BE COMPLETED AND SIGNED TO BE ELIGIBLE. I AM OF LEGAL AGE: ☐ YES ☐ NO

I select TELCAM as my agent for long distance subscription for the phone numbers listed above and request that you place me on TELCAM's
long distance service. I know that I can only have one long distance carrier and that my previous carrier will be cancelled. In 90 days I will send to TEL-
CAM a photocopy of my bill if I was charged by my local phone company for changing to TELCAM and TELCAM will credit my bill an equal amount.
This will only effect my 1+ service. I am legally authorized to make this change. By my signature below I hereby authorize TELCAM to change my long
distance service to TELCAM's service.

HOME PH. # () PRINT NAME;
AS LISTED
IN PHONE BOOK

ADDRESS CITY STATE ZIP

AUTHORIZED SIGNATURE. Must be signed to qualify. X Date

Check here ☐ if you do not want to help local charities by changing long distance service, but still want your name entered
in the contest. Changing your long distance service to TELCAM automatically qualifies you to win the prize offered.

Take an extra copy of this form for your records. TELCAM (9/94)

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TELCAM Page 2 of 2

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In the interest of providing low-cost long distance service to its customers, while at the same time generating significant revenue to meet corporate commitments to charitable organizations, TELCAM operates with a relatively small profit margin. Under such circumstances, the cost of obtaining customers is strongly impacted by sales and authorization materials.

Requiring two forms be used would more than double the sales material's form pad costs which already represent a substantial part of the box program's sales expense. Further, it would require new design and box construction dies which are estimated to cost \$9,500 initially, and cause an reoccurring cost increase of 11% per box produced.

In order to maintain TELCAM profit margins at current levels, meeting the proposed LOA/inducement form requirements would require a consumer rate increase of approximately 4%.

We further suggest that requiring two forms represents a discriminatory requirement that will result in an unnecessary increased cost of sales, and therefore jeopardize TELCAM's ability to remain in business.